

COUNT 1
(Conspiracy to Create and Distribute Animal Crush Videos)

5. Paragraphs 1 through 4 of the Indictment are incorporated herein.

6. Beginning on an unknown date but no later than on or about March 12, 2023, and continuing through at least on or about April 22, 2023, in the Southern District of Ohio and elsewhere, the defendants, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic,” GIANCARLO MORELLI**, and **PHILIP COLT MOSS** did unlawfully and knowingly combine, conspire, confederate, and agree with each other and with other persons whose identities are known and unknown to the Grand Jury, to commit the following objects of the conspiracy:

Objects of the Conspiracy

- A. To knowingly create and cause the creation of animal crush videos outside of the United States, for distribution and transportation to the United States, in or using a means and facility of interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 48(a)(2) and (b); and
- B. To knowingly sell, market, advertise, exchange, and distribute animal crush videos within the United States, in or using a means and facility of interstate and foreign commerce, in violation of Title 18, United States Code, Sections 48(a)(3) and (b).

Manner and Means

7. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

- a. It was part of the conspiracy for defendants **NICHOLAS T. DRYDEN a/k/a “Niko Bellic,” GIANCARLO MORELLI, PHILIP COLT MOSS**, and co-conspirators to administer and engage in private online group and one-on-one chats on encrypted messaging applications, the purposes of which were to view, discuss,

promote, advertise, purchase, sell, create, exchange, distribute, and fund graphic videos depicting, among other things, the torture, murder, sexually sadistic mutilation, and sexual abuse of animals, specifically baby and adult monkeys.

b. It was part of the conspiracy for defendants **GIANCARLO MORELLI**, **PHILIP COLT MOSS**, and co-conspirators, to send funds electronically to defendant **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** for the purpose of funding the creation of, and purchasing, graphic videos depicting, among other things, the torture, murder, sexually sadistic mutilation, and sexual abuse of animals, specifically baby and adult monkeys.

c. It was part of the conspiracy for **NICHOLAS T. DRYDEN a/k/a “Niko Bellic,”** to send funds electronically to individuals (known as “videographers” or “VOs”) outside of the United States in exchange for the creation and distribution of graphic videos depicting, among other things, the videographers engaging in the torture, murder, sexually sadistic mutilation, and sexual abuse of animals, specifically baby and adult monkeys.

d. It was further part of the conspiracy for the videographers to electronically distribute and transport the resulting videos to defendant **NICHOLAS T. DRYDEN a/k/a “Niko Bellic,”** who resided in the Southern District of Ohio.

e. It was part of the conspiracy for defendant **NICHOLAS T. DRYDEN a/k/a “Niko Bellic,”** to electronically distribute videos depicting, among other things, the torture, murder, sexually sadistic mutilation, and sexual abuse of animals, specifically baby and adult monkeys, to defendants **GIANCARLO MORELLI**, **PHILIP COLT MOSS**, and other co-conspirators, using various online platforms.

Overt Acts

8. In furtherance of the conspiracy, and to effect and accomplish its objectives, defendant **NICHOLAS T. DRYDEN a/k/a “Niko Bellic,” GIANCARLO MORELLI, PHILIP COLT MOSS**, and other co-conspirators committed one or more of the following overt acts:

Overt Act 1. On or about April 3, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic,”** sent the following message¹ to Videographer 1 (VO1), a minor living in Indonesia, on WhatsApp, an encrypted messaging application: “If you have your ID, there is 300 dollars waiting for you at the Western Union near you. I should give you the tracking.”

Overt Act 2. On or about April 4, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent the following message to VO1 on WhatsApp: “Listen. I’m new at this too. I don’t feel good knowing this bank account is tied to our government’s name.”

Overt Act 3. On or about April 4, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent the following messages to VO1 on WhatsApp:

DRYDEN: If you want to continue doing business with me, we need to find a new way to send money. When will you turn 18 years old?”

...

DRYDEN: We can use it from now on if you want, if it works this time good luck and then when you are 18 years old if we’re still going business together, but I strongly suggest that you use your own bank account

¹ Note: messages between DRYDEN and VO1 have been translated from Indonesian to English by a certified translator.

Overt Act 4. On or about April 4, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent the following message to VO1 on WhatsApp: “Don’t send the link to anyone or both of us will get caught.”

Overt Act 5. On or about April 5, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent the following message to VO1 on WhatsApp: “Just be honest with you, bro, we should use Bitcoin or something like that since from the beginning, this shit is not the most legal thing.”

Overt Act 6. On or about April 5, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent the following message to VO1 on WhatsApp: “Name = Nicholas Dryden. Date of birth = [Redacted]”

Overt Act 7. On or about April 6, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent the following message to VO1 on WhatsApp: “If you want to make more money with me, we should buy a baby monkey.”

Overt Act 8. On or about April 7, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** and VO1 exchanged the following messages on WhatsApp:

DRYDEN: Bottom line, brother. Tell me if you could make the video tonight. Get an ordinary baby with a long tail and if you can, please try to make a good video tonight.

VO1: Oaky, I will try.

VO1: Now.

VO1: I asked the monkey seller to deliver the baby monkey now.

DRYDEN: Okay get the smallest and healthiest and when you get it, let me know.

Please let me send a short video. Customers have been waiting for too long, we have to please them.

DRYDEN: Okay bro. I'm going to send you some ideas. Let's make good money again.

...

DRYDEN: So, this is the best video that you have ever made. I don't care. Go ahead and kill it. I'll buy another one tomorrow.

Overt Act 9. On or about April 7, 2023, **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** sent the following messages to VO1 on WhatsApp:

DRYDEN: Yes, I'm taking up your time easily, brother. Don't rush it. Don't rush it.

...

DRYDEN: I'm...I'm happy, not angry with you, I have no complaints. You did an amazing thing, protect it.

...

DRYDEN: Bro, you're, you're a cool guy. Cool friend. We make more money by producing.

Overt Act 10. On or about April 8, 2023, in the Southern District of Ohio, **NICHOLAS T.**

DRYDEN a/k/a "Niko Bellic" received an animal crush video electronically from VO1. The video is approximately 30 minutes and 20 seconds long. It initially depicts a piece of paper with the words "Niko Bellic" written across it. The video then depicts various acts of torture being performed by VO1 upon a juvenile monkey, including burning the genitals and anus of the monkey.

Overt Act 11. On or about April 9, 2023, **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** and VO1 exchanged the following messages on WhatsApp:

DRYDEN: Can you get a very small, long tail² today? The smallest one that you could find.

VO1: I'll find it for you today.

DRYDEN: And for some reason customers want you to put diapers on a monkey. I don't like this customer, but he pays well.

...

DRYDEN: Okay don't worry about the APE today. Only get a long tailed. This customer is asking you to put diapers on a baby monkey and get the smallest diapers you can find. This customer is the best.

DRYDEN: He pays the most. So, it will be good to do what he says. He also sent me some ideas too. Tell me the approximate time when the baby monkey will arrive and when the video is ready.

Overt Act 12. On or about April 10, 2023, **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** sent the following message to VO1 on WhatsApp: "When making the video, make the other one watch the other monkey getting tortured."

Overt Act 13. On or about April 10, 2023, **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** sent the following messages to VO1 on WhatsApp:

DRYDEN: Send me a photo of the second baby.

DRYDEN: He said he wants you to put diapers on it. I don't know why. But this is what he asked for

DRYDEN: He is weird.

DRYDEN: He kept asking me that.

² Note: a long-tailed macaque is a species of primate native to southeast Asia.

Overt Act 14. On or about April 11, 2023, **NICHOLAS T. DRYDEN** a/k/a “Niko Bellic” and **GIANCARLO MORELLI** exchanged the following messages on Telegram, an encrypted messaging and chat application:

DRYDEN: U want it for 75

DRYDEN: I’ll do 65

...

MORELLI: Sent

DRYDEN: Did u get it

MORELLI: I’m trying to get it to download

...

MORELLI: I just finished the first one. I gotta say, wasn’t one of his best ones.

He spent too much time with the diaper problem. He did beat the shit out of it tho. To only beat the shit out of them is good if they are a little older or if it’s a pigtail.³ This way they fight back a little you know? I had an idea. You know how he’s always getting females. You how everyone hates the damn mudflaps⁴ they have? Why doesn’t he cut open a mudflap in a video to see what’s in there? Lol

...

DRYDEN: Yea ur right. And as the top person who contributes I will make that happen in the next video for you and I really appreciate the advice man. I geuss tonight is mudflap madness

³ Note: the southern pig-tailed macaque and northern pig-tailed macaque are species of primate native to southeast Asia

⁴ Note: “mudflap” is a slang term for genitalia.

Overt Act 15. On or about April 12, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent the following messages to VO1 on WhatsApp:

DRYDEN: Be creative with the next one. Pull his tongues as far as you can with pliers. Put his feet in boiling water, cut off his ears and set his head on fire with a lighter

...

DRYDEN: Dress him in yellow clothes and be nice to it first by feeding him with the bottle.

...

DRYDEN: Go ahead and surprise me. Be creative. I want to see how creative you are.

Overt Act 16. On or about April 12 and 13, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** and VO1 exchanged the following messages on WhatsApp:

DRYDEN: Okay. How was your day? Please make a good video. Dress it in yellow again. At the beginning, be nice to the monkey, feed it with a bottle, and then whip it for no reason.

...

DRYDEN: And below “Niko Bellic” write “[Redacted] Is A Snitch,”

DRYDEN: Make sure that you write “[Redacted] is a snitch.” Don’t forget to do that and wear the yellow outfit.

DRYDEN: Is everything okay? What time will the video be released so that I can tell the customer?

DRYDEN: Can you tell me something brother?

DRYDEN: The buyer will cancel

VO1: I'll make it now.

Overt Act 17. On or about April 13, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”**

received an animal crush video electronically from VO1. The video is approximately 19 minutes and 16 seconds long. It initially depicts a piece of paper sitting on a wire cage with the words “Niko Bellic” and “[Redacted] is a Snitch” written across it. The video then depicts various acts of torture being performed by VO1 upon a baby monkey in a yellow wrapping, including burning the genitals and anus of the monkey.

Overt Act 18. On or about April 13, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent

the following message to VO1 on WhatsApp: “Okay. Thank you, bro. Tomorrow. We buy another 2. Let’s see how these videos work.”

Overt Act 19. On or about April 13, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** and

GIANCARLO MORELLI exchanged the following messages on Telegram:

DRYDEN: 3 part series coming to DVD at a block buster near u

MORELLI: Nice

DRYDEN: Is it good

MORELLI: I’m waiting till I get home, can’t really watch it at work Lmao

MORELLI: I’m going to be a little honest. He needs to get a little bit better rats.⁵

These are like dollar store rats. They don’t last at all. This one barely got a beating and it’s lifeless. I don’t know if it’s bc they are females. But damn. It seems like on the hard torture/kill vids, they tap out quick as hell

DRYDEN: Yea ur right bro. But I thought the second one was pretty fuckin tough

DRYDEN: The first one was a bitch

⁵ Note: a slang term for monkeys.

MORELLI: I haven't watched the second one yet

MORELLI: I'm moving on to that one

Overt Act 20. On or about April 13, 2023, **GIANCARLO MORELLI** sent messages to **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** on Telegram proposing multiple prepaid debit cards that did not to require a Social Security number.

Overt Act 21. On or about April 13, 2023, **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** sent the following message to VO1 on WhatsApp: "Okay I will send the money. In a few hours, get another baby monkey."

Overt Act 22. On or about April 14, 2023, **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** sent the following messages to VO1 on WhatsApp:

DRYDEN: I want you to leave one of them without a leg and then let him crawl to the adult monkeys.

DRYDEN: And hold the other one, be very nice to him feed him and dress him in yellow clothes while the other monkey crawls without a leg. After cutting off his leg, burn the wound with a lighter.

DRYDEN: To burn the wounds and throw salt on it. Please include older monkeys in this video because it seems to attract most customers. Please do this thing that I mentioned.

DRYDEN: And add some of your own stuff into it. Make them lengthy like the last time.

Overt Act 23. On or about April 15, 2023, after **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** sent a message to defendant **PHILIP COLT MOSS** stating he was starting a new online

group for sharing animal crush videos, MOSS sent the following messages to DRYDEN on Telegram:

MOSS: shit man how come youre not making me an admin

MOSS: i am not feeling the love

MOSS: just ssaw the newest group u made

Overt Act 24. On or about April 16, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent the following messages to VO1 on WhatsApp:

DRYDEN: Could make the video right now?

DRYDEN: I’ve sent You all the ideas and things to do

DRYDEN: And write on paper, “Niko Loves You Guys”

DRYDEN: Let me know if you can do it now

DRYDEN: It would be an amazing brother if you could.

Overt Act 25. On or about April 16, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent the following message to VO1 on WhatsApp: “If you can make a video in the next 2 hours, I will give you 40 dollars extra.”

Overt Act 26. On or about April 16, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** received an animal crush video electronically from VO1. The video is approximately 30 minutes long. It initially depicts a piece of paper with the words “Niko Bellic Loves You Guys” written across it. The video then depicts various acts of torture being performed by VO1 upon a monkey, including burning the genitals and anus of the monkey.

Overt Act 27. On or about April 16, 2023, and April 17, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** invited **PHILIP COLT MOSS** to join an internet group DRYDEN had

started called “Famiglia Privata,” after which DRYDEN and MOSS exchanged the following messages on Telegram:

DRYDEN: You ain't fuckin wit the videos no more brother ?

MOSS: Yes sir I still am

MOSS: And just requested to join new group

MOSS: Family private

MOSS: Familia privata. What u got for videos

DRYDEN: Okay got i

DRYDEN: It's about 2 hours or more of footage

DRYDEN I got 5 or 6 videos you haven't seen bro

DRYDEN: I will send you all 5 of them for 140

Overt Act 28. On or about April 17-18, 2023, while discussing taking a trip together to Indonesia, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** and **PHILIP COLT MOSS** exchanged the following messages on Telegram:

DRYDEN: We can go visit the vo.and ur dude

MOSS: i would love that dude

...

MOSS: we would have the time of our lives

MOSS: and make our own sauce⁶

...

DRYDEN: Hell yeah our sauce will be better then [redacted]

⁶ Note: “sauce” is a slang term for monkey crush videos.

Overt Act 29. On or about April 17, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** and **PHILIP COLT MOSS** exchanged the following messages on Telegram:

MOSS: and how are people being vetted

MOSS: in these groups

MOSS: like what is the process

DRYDEN: Basically i jus go with my gut.

DRYDEN: But I usually ask em a series of questions

...

DRYDEN: Then I say , you have 2 minute to screenshot your galleru and show me what torture videos you have downloaded

...

MOSS: damn thats legit.

MOSS: you havea. system

Overt Act 30. On or about April 17, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** and **PHILIP COLT MOSS** exchanged the following messages on Telegram:

DRYDEN: If ur low on bread brother I'll throw u a couple for free

DRYDEN: Sounds like u been working hard. u deserve it

...

MOSS: shit dude for real. youre a good friend. i appreciate that. but i insist on paying bc u work hard to make that all happen

MOSS: but that meansa. lot thank u

DRYDEN: It's okay brother. I got about 8 you haven't seen. I am gonna send now. What ever u decide to send. You can send it .

DRYDEN: Send me ur email

MOSS: cmoss8[redacted]

MOSS: thats awesome man

MOSS: i cant wait

Overt Act 31. On or about April 17, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent the following messages to **GIANCARLO MORELLI** on Telegram:

DRYDEN: I'll give u all 3 videos for 70

DRYDEN: I'ma be done editing soon . But it's 42 minutes worth of footage

Overt Act 32. On or about April 17, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** and **GIANCARLO MORELLI** exchanged the following messages on Telegram:

MORELLI: ill send you the bread

MORELLI: same cash app still right?

DRYDEN: Yes

DRYDEN: Yea I'm good brother . After u watch this lmk war u think

MORELLI: sent

DRYDEN: Okay I'm bout to invite u

DRYDEN: What ur email

MORELLI: lordcmdrgc[redacted]

Overt Act 33. On or about April 17, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** distributed an animal crush video electronically to defendant **GIANCARLO MORELLI**.

Overt Act 34. On or about April 17, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** sent the following messages to VO1 on WhatsApp:

DRYDEN: Here are some other suggestions. Choke it to almost dead (pinching the throat), bees or ants in jars, put super glue in the hands, buttocks or mouth, stretch its arms and legs with a ratchet until it is broken

DRYDEN: Tie him to the cage and force him to eat shit. Then put out the cigarette. If you have a snake, let the snake attack him first, then in his eyes. Then force him into a small jar with cap and fill it with water until he almost drowns

DRYDEN: If you have a snake, let the snake attack him first and beat him up a little bit but don't knock him out. Tie him to the cage and put a cigarette in his eyes and forced him to eat

DRYDEN: Then after that force him into the small jar and cover it. Fill it with water until he almost drowns and then after that see if he wants to eat bananas

DRYDEN: then break every bone in his leg with pliers that you have and throw him back with the snake and brutally beat it to death.

Overt Act 35. On or about April 17, 2023, **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** sent the following message to VO1 on WhatsApp: "This customer is asking you to do all the things that he asked for, He paid us repeatedly. I told him that you would do it for him."

Overt Act 36. On or about April 17, 2023, **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** sent the following messages to VO1 on WhatsApp:

DRYDEN: Put " niko bellic" then on telegram button @nb932"

...

DRYDEN: "Telegram @nb932"

Overt Act 37. On or about April 18, 2023, **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** received an animal crush video electronically from VO1. The video is approximately 31

minutes and 5 seconds long. It initially depicts a piece of paper with the words “Niko Bellic Telegram @NB932” written across it. The video then depicts various acts of torture being performed by VO1 upon a monkey, including putting superglue into the anus of a monkey.

Overt Act 38. On or about April 18, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”**

posted the following message to the Telegram group Famiglia Privata: “Okay I’m bout to send you previews of the latest video. One of the best he’s ever done By far.” DRYDEN then posted a screenshot from a video showing a monkey with its legs bound with tape, eyes closed and mouth open, held by the neck. A paper with the words “Niko Bellic Telegram @NB932” is visible underneath the monkey.

Overt Act 39. On or about April 18, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”**

posted multiple short “teaser” videos to the Telegram group Famiglia Privata. In one, a 13 second video, the videographer is seen holding a baby male monkey. The monkey is brought closer to the camera for a close-up shot of the monkey’s genitals. The watermark “@NB932” is visible across the screen.

Overt Act 40. On or about April 18, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”**

distributed an animal crush video electronically to **PHILIP COLT MOSS**.

Overt Act 41. On or about April 18, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** and

PHILIP COLT MOSS exchanged the following messages on Telegram:

DRYDEN: Whatsup brother

DRYDEN: Did u watch the videos

MOSS: shit just chilling man. and yes!!

MOSS: they were good. when did he film all those

Overt Act 42. On or about April 19, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** and

VO1 exchanged the following messages on WhatsApp:

VO1: What idea that you will give?

VO1: To make it now.

DRYDEN: Okay kill the smaller one first.

DRYDEN: Make Mom and Dad watch

DRYDEN: Tie it to a cage, break all four limbs with pliers.

VO1: Okay.

...

DRYDEN: Wait a minute, I'll send some more.

DRYDEN: What sort of tools do you have?

DRYDEN: Do you have a blender?

...

DRYDEN: Do this again with the little one but do this without any mercy

DRYDEN: Also, don't forget to dress it in yellow clothes

DRYDEN: Burn his ass with matches and burn his hands and feet in boiling water

DRYDEN: Then let him crawl around to see if he will go to his parents.

...

DRYDEN: The customer wants you to kill it by slamming his face to the ground
with its feet at the end.

DRYDEN: One other thing. Let the teenage monkey live. But break his arm if
you can. And you can put it back into the cage but make sure you let him watch the
torture.

DRYDEN: And let them go to each other from time to time, then separate them.

Overt Act 43. On or about April 20, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”**

received an animal crush video electronically from VO1. The video is approximately 33 minutes and 23 seconds long. The video depicts various acts of torture being performed by VO1 upon a monkey, including burning the genitals and anus of the monkey repeatedly and cutting the genitals of a male monkey with scissors.

Overt Act 44. On or about April 20, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”**

distributed an animal crush video electronically to **GIANCARLO MORELLI**.

Overt Act 45. On or about April 20, 2023, and April 21, 2023, **NICHOLAS T. DRYDEN a/k/a**

“Niko Bellic” and **GIANCARLO MORELLI** exchanged the following messages on

Telegram:

DRYDEN: Check your email

...

MORELLI: oh shit is that a male?

MORELLI: LMAO he super glued his ass?

DRYDEN: Yea we got 2

DRYDEN: I got another one

...

DRYDEN: He beats it to death and cuts it dick off

MORELLI: yes finally!

...

MORELLI: I thought you said he cut it off?

MORELLI: Looks like he tried to but never did

...

DRYDEN: I told him to do it cus u asked for it

MORELLI: Lol. Yea he didn't lol

DRYDEN: Sorry brother I really thought he did . I turned my head an skipped that part that shit makeese queezy I should have made sure before I said that. But what did u think?

MORELLI: It was ok. Just a little constructive criticism. I think he's getting too quick to the knockout. The thing has absolutely no fight left after like 3-5 min. I think he needs to do a little more psychological damage before it is limp. He could also break or cut off fingers and toes.

DRYDEN: I'm gonna send him that

Overt Act 46. On or about April 21, 2023, **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"**

invited **GIANCARLO MORELLI** and **PHILIP COLT MOSS** to join an internet group

DRYDEN had started called "American Dookie."

Overt Act 47. On or about April 21, 2023, **NICHOLAS T. DRYDEN a/k/a "Niko Bellic"** and

PHILIP COLT MOSS exchanged the following messages on Telegram:

DRYDEN: Aye I got 3 new videos

...

DRYDEN: I got u for 80 for all 3

MOSS: I'll buy em!

MOSS: Lol

...

DRYDEN: It sent I'm bout to upload it

MOSS: Hell yes

Overt Act 48. On or about April 21, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”**

distributed an animal crush video electronically to **PHILIP COLT MOSS**.

Overt Act 49. On or about April 21, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** and

PHILIP COLT MOSS exchanged the following messages on Telegram:

DRYDEN: I got some new videos I interested

MOSS: Yea yes

...

MOSS: when did he make new ones

MOSS: is he making them dailty lol

DRYDEN: I'm looking for a new car. And he is taking this whole week off

DRYDEN: He just made these

DRYDEN: What was the last video u saw

MOSS: ok nice nice. ya u need to get out here. you sent me two last night. one was super glue in its mouth and the other had two monleys but he fucked with the quiet one and left the loud one in the cage

...

MOSS: 33:23. 31:05

MOSS: is length

Overt Act 50. On or about April 21, 2023, and April 22, 2023, **NICHOLAS T. DRYDEN a/k/a**

“Niko Bellic” and **PHILIP COLT MOSS** exchanged the following messages on Telegram:

DRYDEN: Nothin bro I got 2 new videos just give me 75

...

MOSS: yeea i. want it

DRYDEN: Alright its 2 videos . I'm not supposed to sell u the first one

DRYDEN: But I will

DRYDEN: Just do not tell anyone u got these

MOSS: thanks brother. wjhy arent u sposed to tho?

DRYDEN: Because somebody bought the first part as an exclusive.

DRYDEN: But he won't know cus I trust u

MOSS: of course bro

MOSS: wont say a word wont ever share it

DRYDEN: I trust u bro. Lol what they don't know won't hurt em

MOSS: damn straight!!!

MOSS: yo where do i pay uy for this

MOSS: do u need my email again

DRYDEN: Yes

MOSS: cmoss8[redacted]

DRYDEN: And pay here brother

MOSS: Paying

Overt Act 51. On or about April 22, 2023, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”**

invited **GIANCARLO MORELLI** to join an internet group DRYDEN had started called “Famiglia Privata.”

Overt Act 52. – 70. On or about the dates listed below, **GIANCARLO MORELLI** sent funds electronically to **NICHOLAS T. DRYDEN a/k/a “Niko Bellic,”** each of which is a separate overt act in furtherance of the conspiracy:

	Date	Amount
Overt Act 52	3/13/2023	\$70
Overt Act 53	3/14/2023	\$60
Overt Act 54	3/15/2023	\$40
Overt Act 55	3/15/2023	\$60
Overt Act 56	3/18/2023	\$80
Overt Act 57	3/18/2023	\$100
Overt Act 58	3/21/2023	\$80
Overt Act 59	3/23/2023	\$80
Overt Act 60	3/26/2023	\$50
Overt Act 61	3/27/2023	\$40
Overt Act 62	3/29/2023	\$60
Overt Act 63	3/30/2023	\$60
Overt Act 64	4/2/2023	\$60
Overt Act 65	4/6/2023	\$50
Overt Act 66	4/9/2023	\$80
Overt Act 67	4/11/2023	\$65
Overt Act 68	4/13/2023	\$80
Overt Act 69	4/18/2023	\$70
Overt Act 70	4/21/2023	\$50

Overt Act 71. – 88. On or about the dates listed below, **PHILIP COLT MOSS** sent funds electronically to **NICHOLAS T. DRYDEN a/k/a “Niko Bellic,”** each of which is a separate overt act in furtherance of the conspiracy:

	Date	Amount
Overt Act 71	2/27/2023	\$65
Overt Act 72	3/1/2023	\$65
Overt Act 73	3/7/2023	\$50
Overt Act 74	3/12/2023	\$65
Overt Act 75	3/15/2023	\$65
Overt Act 76	3/16/2023	\$60
Overt Act 77	3/18/2023	\$68
Overt Act 78	3/21/2023	\$80
Overt Act 79	3/22/2023	\$50
Overt Act 80	3/25/2023	\$50

Overt Act 81	3/26/2023	\$40
Overt Act 82	3/27/2023	\$50
Overt Act 83	3/29/2023	\$30
Overt Act 84	4/4/2023	\$50
Overt Act 85	4/6/2023	\$379
Overt Act 86	4/9/2023	\$100
Overt Act 87	4/18/2023	\$100
Overt Act 88	4/21/2023	\$80

All in violation of 18 U.S.C. § 371.

COUNT 2
**(Production, Distribution, and Receipt of Visual Representation
of Sexual Abuse of Children)**

9. Paragraphs 1 through 4 of the Indictment are incorporated herein.

10. On or about March 12, 2023, within the Southern District of Ohio and elsewhere, the defendant, **NICHOLAS T. DRYDEN a/k/a “Niko Bellic,”** under the circumstances described in 18 U.S.C. § 1466A(d)(1), (d)(2), and (d)(4), did knowingly produce, distribute, receive, and possess with intent to distribute a visual depiction of (1) a minor engaging in sexually explicit conduct and such depiction was obscene, and/or (2) a minor engaging in graphic bestiality and sadistic abuse and such depiction lacked serious literary, artistic, political, or scientific value; that is, a video of a minor engaging in various acts with a baby monkey to include sticking a spoon in the monkey’s anus, dunking the monkey into a container of water with the spoon protruding from its anus, slamming it repeatedly into a cage by its tail, and ultimately killing the baby monkey.

All in violation of 18 U.S.C. § 1466A(a) and 18 U.S.C. § 2.

COUNT 3
**(Production, Distribution, and Receipt of Visual Representation
of Sexual Abuse of Children)**

11. Paragraphs 1 through 4 of the Indictment are incorporated herein.

12. On or about March 25, 2023, within the Southern District of Ohio and elsewhere, defendant **NICHOLAS T. DRYDEN a/k/a “Niko Bellic”** under the circumstances described in 18 U.S.C. § 1466A(d)(1), (d)(2), and (d)(4), did knowingly produce, distribute, receive, and possess with intent to distribute a visual depiction of (1) a minor engaging in sexually explicit conduct and such depiction was obscene, and/or (2) a minor engaging in graphic bestiality and sadistic abuse and such depiction lacked serious literary, artistic, political, or scientific value; that is, a video of a minor engaging in various acts with a baby monkey to include sticking a wooden skewer in the monkey’s anus, sticking fish hooks in the monkey’s head, attaching the monkey to a cage using a fishhook protruding from its head, burning the monkey’s face and head, cutting the monkey repeatedly in the mouth, head, and body with wire cutters, picking up the monkey by a wooden skewer protruding from its anus, and ultimately killing the baby monkey.

All in violation of 18 U.S.C. § 1466A(a) and 18 U.S.C. § 2.

COUNT 4
**(Production, Distribution, and Receipt of Visual Representation
of Sexual Abuse of Children)**

13. Paragraphs 1 through 4 of the Indictment are incorporated herein.

14. On or about April 20, 2023, within the Southern District of Ohio and elsewhere, defendant **NICHOLAS T. DRYDEN a/k/a “Niko Bellic,”** under the circumstances described in 18 U.S.C. § 1466A(d)(1), (d)(2), and (d)(4), did knowingly produce, distribute, receive, and possess with intent to distribute a visual depiction of (1) a minor engaging in

sexually explicit conduct and such depiction was obscene, and/or (2) a minor engaging in graphic bestiality and sadistic abuse and such depiction lacked serious literary, artistic, political, or scientific value; that is, a video of a minor engaging in various acts with a baby monkey to include tying the monkey to a cage, burning the monkey's genitals and anus as it was tied to the cage, burning the monkey's head, cutting the monkey's genitals with scissors, slamming the monkey's head into the side of the wire cage, and ultimately killing the baby monkey.

All in violation of 18 U.S.C. § 1466A(a) and 18 U.S.C. § 2.

COUNT 5
(Creation Of Animal Crush Video)

15. Paragraphs 1 through 4 of the Indictment are incorporated herein.

16. On or about between March 12, 2023, and April 22, 2023, within the Southern District of Ohio and elsewhere, defendant **NICHOLAS T. DRYDEN a/k/a "Niko Bellic,"** did knowingly create, cause the creation, and aid and abet the creation of one or more animal crush videos, intending and having reason to know that the videos would be distributed in, and using a means and facility of, interstate and foreign commerce, and transported into the United States.

All in violation of 18 U.S.C. § 48(a)(2) and 18 U.S.C. § 2.

COUNT 6
(Distribution of Animal Crush Video)

17. Paragraphs 1 through 4 of the Indictment are incorporated herein.

18. On or about between March 12, 2023, and April 22, 2023, within the Southern District of Ohio and elsewhere, defendant **NICHOLAS T. DRYDEN a/k/a "Niko Bellic,"** did knowingly sell, market, advertise, exchange, and distribute, cause to be sold, marketed,

advertised, exchanged, and distributed, and aided and abetted the sale, marketing, advertisement, exchange, and distribution of one or more animal crush videos, intending and having reason to know that the videos would be distributed in, and using a means and facility of, interstate and foreign commerce.

All in violation of 18 U.S.C. § 48(a)(3) and 18 U.S.C. § 2.

COUNT 7
(Distribution of Animal Crush Video)

19. Paragraphs 1 through 4 of the Indictment are incorporated herein.

20. On or about between March 12, 2023, and April 22, 2023, within the Southern District of Ohio and elsewhere, defendant **GIANCARLO MORELLI**, did knowingly sell, market, advertise, exchange, and distribute, cause to be sold, marketed, advertised, exchanged, and distributed, and aided and abetted the sale, marketing, advertisement, exchange, and distribution of one or more animal crush videos, intending and having reason to know that the videos would be distributed in, and using a means and facility of, interstate and foreign commerce.

All in violation of 18 U.S.C. § 48(a)(3) and 18 U.S.C. § 2.

COUNT 8
(Distribution of Animal Crush Video)

21. Paragraphs 1 through 4 of the Indictment are incorporated herein.

22. On or about between March 12, 2023, and April 22, 2023, within the Southern District of Ohio and elsewhere, defendant **PHILIP COLT MOSS**, did knowingly sell, market, advertise, exchange, and distribute, cause to be sold, marketed, advertised, exchanged, and distributed, and aided and abetted the sale, marketing, advertisement, exchange, and distribution of one or more animal crush videos, intending and having reason

to know that the videos would be distributed in, and using a means and facility of, interstate and foreign commerce.

All in violation of 18 U.S.C. § 48(a)(3) and 18 U.S.C. § 2.

A TRUE BILL:

/s/

GRAND JURY FOREPERSON

KENNETH L. PARKER
UNITED STATES ATTORNEY

TODD KIM
ASSISTANT ATTORNEY GENERAL
ENV. & NAT. RESOURCES DIVISION



ADAM C. CULLMAN (KY#93912)
SR. TRIAL ATTORNEY
SPECIAL ASSISTANT U.S. ATTORNEY

TIMOTHY D. OAKLEY
ASSISTANT U.S. ATTORNEY